

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04-10051-PBS
)	
)	
JORGE ROSARIO)	

JOINT STATUS REPORT

Pursuant to Local Rule 116.5(A), the parties are hereby jointly filing the following status report prepared in connection with the initial status conference scheduled for April 9, 2004.

1. Local Rule 116.3 Timing Requirements

As set forth below, the defendant is requesting until April 23, 2004 to file its discovery letter. The parties are not otherwise requesting relief from the timing requirements of Local Rule 116.3.

2. Expert Discovery

The government anticipates that, unless there is a stipulation regarding the drugs involved in this case, it will offer expert testimony regarding the drugs at issue. The government will make expert disclosures 30 days before trial. The defendant will make its expert disclosures 15 days before trial.

3. Additional Discovery

The government does not anticipate providing additional

discovery other than additional certifications as they may be received from the laboratory and expert disclosures as may be requested as specified in paragraph 1, above. The defendant is requesting until April 23, 2004 to file its discovery letter. The government does not oppose that request.

4. Motion Date

The parties are jointly requesting that June 7, 2004 be set as the date for discovery Motions to be filed and are requesting that the time between the Initial Status Conference and the date of the Final Status Conference be excluded from all Speedy Trial Act calculations.

5. Speedy Trial Act Calculations

The parties have conferred on the periods excludable from all Speedy Trial Act calculations and agree that the following periods are excludable:

2/24/04-3/17/04	Government's motion for detention
2/27/04-3/26/04	Order for exclusion entered 2/27/04
3/27/04- Final Status	Excluded at the request of all parties in the interest of justice as set forth above.

As of the Final Status Conference, 0 days will have been counted and 70 days will remain under the Speedy Trial Act.

6. Anticipated Trial

The parties believe that it is too early to determine whether a trial in this matter will be required.

7. Final Status Conference

The parties request that a Further Status Conference be scheduled for June 10, 2004 or as soon thereafter as is convenient for the court.

Respectfully submitted,

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